

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

FILED UNDER SEAL

UNITED STATES OF AMERICA)	CASE NO.: 2:15-CR-472
)	
v.)	
)	
)	
DYLANN STORM ROOF)	

**DEFENDANT’S REMAINING OBJECTIONS TO THE COURT’S
PROPOSED CASE-SPECIFIC QUESTIONNAIRE (DKT. NOS. 391-92)**

The Court has directed the parties to set forth any additional objections to the questions set forth in Docket Entries 391 and 392, without re-litigating issues already briefed.

Subject to and reserving all requests and objections previously made, the defense requests one additional modification to the questions set forth in Docket Entry 392. With respect to Question 31, the defense requests that the questions in subparts A-D be modified so as to make clear that the issue of guilt or innocence has been resolved, and thereby minimize the possibility that jurors would answer “No” for the irrelevant reason that guilt might not be proven beyond a reasonable doubt. *See Morgan v. Illinois*, cited and briefed in Dkt. No. 382. *See also* Dkt. Nos. 214, 291, 303, 330, 338, 343, 344. As modified, these questions at the end of Q 31 would read as follows:

- (A) Should the death penalty always be imposed when someone intentionally murders another person?
- (B) Should the death penalty always be imposed when someone commits multiple intentional murders?
- (C) Should the death penalty always be imposed when someone commits intentional murder because of the victims' race or color?
- (D) Should the death penalty always be imposed when someone intentionally murders another person while the victim is freely exercising his or her religious beliefs.

Respectfully submitted,

s/ David I. Bruck

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